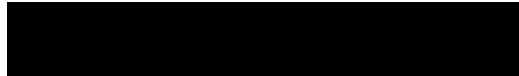


EXHIBIT 3



V.

Defendants.

Civil Action No. 2:21-cv-309-JRG
(Member Case)

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[REDACTED]

against infringers who are unwilling to obtain a license on fair and reasonable terms. My co-Managing Director, Mark Roche, shares in these duties. He lives and works in Plano, Texas. I have relevant knowledge concerning at least the Patents-in-Suit, TQ Delta's licensing activities, and TQ Delta's pre-suit efforts to license its patent portfolio to CommScope and Nokia.

5. I understand that CommScope has indicated its belief that I am a witness having relevant information concerning the above-referenced lawsuit. I also understand that the Court may consider my convenience and willingness to appear for trial in connection with its decision on a motion to transfer venue to the District of Delaware that CommScope has filed in the above-captioned lawsuit. I understand that the trial of this case is currently scheduled for January 2, 2023, in Marshall, Texas. If the trial of this lawsuit is held in Marshall, Texas, and the parties request my appearance as a witness, I am willing to appear in person, without being served with a subpoena, to testify at trial, and such live appearance will not be inconvenient for me. Attending a trial in Marshall would be much more convenient and less costly for me than if the trial were held in the District of Delaware. Because I live and work much closer to the Marshall courthouse than Delaware, there would be significant savings in travel time and cost.

6. TQ Delta's headquarters is located at 900 S. Capital of Texas Hwy, Austin, Texas 78746 in Travis County. The headquarters has been located here since 2020. At the headquarters, including when this lawsuit was filed in August 2021, TQ Delta has several computers that maintain and can access the files and emails pertaining to TQ Delta. The files and emails are stored in cloud-based file storage and email platforms, which are Dropbox and Microsoft 365. All of TQ Delta's shared files are stored locally on these computers, and they are also available on Dropbox. Any changes made to any of the shared files by anyone are nearly instantly synchronized to these local computers.

[REDACTED]

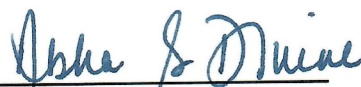
7. TQ Delta's electronic files consist primarily of patent purchase documents, patent license and settlement agreements from prior patent enforcement actions in federal court, financial records, copies of TQ Delta's patents with prosecution materials, and emails, including documents of the types described here relating to the Asserted Patents, this litigation, and TQ Delta's licensing and other business activities.

8. Since early 2020, the Austin office has been used less often than before due to the difficulties and health risks brought on by the ongoing COVID-19 pandemic. Thus, since early 2020, I have primarily been working from my home office in Austin when I am not working from TQ Delta's primary office in Austin. From my home office, including when this lawsuit was filed in August 2021, I maintain files and emails pertaining to TQ Delta which are stored locally on my computer. These files are mirrored on Dropbox. The emails are stored on Microsoft 365. Additionally, all of TQ Delta's shared files are stored locally on my computer, and they are also available on Dropbox.

9. At the Austin headquarters and at my home office, TQ Delta also keeps paper copies of important TQ Delta documents. These paper copies are not merely printed copies of electronic documents; they are the original documents that will need to be physically transported to trial. Examples of such documents include certain license agreements and ribbon copies of Patents-in-Suit.

I declare under the penalty of perjury under the laws of the United States of America that the preceding is true and correct.

Date: February 22, 2022


Abha Divine